

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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PEOPLE OF THE STATE OF NEW YORK, by  
ELIOT SPITZER, ATTORNEY GENERAL OF THE  
STATE OF NEW YORK,

**CV 99 4951**

Plaintiffs,

-against-

DELTA FUNDING CORPORATION, DELTA  
FINANCIAL CORPORATION, ALL STATE  
CONSULTANTS, INC. a/k/a & d/b/a CITY  
MORTGAGE BANKERS INC., PGM ENTERPRISE  
INC., RICHMINT FUNDING LTD. d/b/a THE MONEY  
CENTER, TARHEEL FUNDING INC., JOHN  
DOE CORP.'S 1-10, DELTA FUNDING HOME  
EQUITY LOAN TRUST, and BANKERS TRUST  
COMPANY OF CALIFORNIA, N.A.,

Index No.

**COMPLAINT  
AND JURY DEMAND**

**GO, M.**

Defendants.  
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The People of the State of New York, by and through their attorney, Eliot Spitzer,  
Attorney General of the State of New York, as and for their complaint, allege, upon information  
and belief, as follows:

**PRELIMINARY STATEMENT**

1. Plaintiffs bring this action to seek redress against a finance company,  
Delta Financial Corporation, its wholly-owned subsidiary, Delta Funding Corporation,  
(collectively "Delta" or "Delta defendants"), and certain mortgage brokers who refer business to  
Delta. Collectively, these defendants have engaged in a pattern and practice of targeting low-  
income minority homeowners and inducing them to enter into illegal, discriminatory, and  
fraudulent high-cost mortgage loans, which defendants have reason to know these borrowers  
either cannot repay or can repay only through extreme personal and financial privation.

(1)